



*Via ECF*

March 27, 2017

Hon. Paul G. Gardephe  
United States District Court for the  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

Re: *United States v. Tuzman*, 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We write respectfully on behalf of Mr. Isaza Tuzman to request that Your Honor endorse this letter memorializing the below agreement with the Government. In advance of this Friday's pretrial motion deadline, the parties have conferred regarding Mr. Isaza Tuzman's demand for a bill of particulars and although there is one issue that remains in dispute (which will be briefed as part of Mr. Isaza Tuzman's Omnibus Pretrial Motion), the Government has agreed to provide the following information by April 28, 2017:

1. The identity of all presently-known alleged co-conspirators;
2. Examples of alleged acts committed within the statute of limitations period for Count 4;
3. Examples of interstate wires made in furtherance of the scheme charged in Count 5;
4. The identity of all auditing firms that were allegedly misled in connection with the charged crimes;
5. A list of the SEC reports that allegedly contained false and misleading statements;
6. A list of all presently-known alleged round-trip transactions, as the term is used in the superseding indictment;
7. A list of all presently-known perpetual license contracts that were part of the alleged accounting fraud scheme;
8. A list of all presently-known contracts that were allegedly fabricated for purposes of the charged accounting fraud scheme.

With the exception of items 2 and 3 above, the Government has agreed to supplement the information if and when additional information comes to light.

Respectfully,

A handwritten signature in blue ink, appearing to read "Silvia L. Serpe". The signature is fluid and cursive, with the first name "Silvia" and last name "Serpe" clearly distinguishable.

Silvia L. Serpe

cc: Counsel of Record Via ECF